

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

<hr/>	X	
DONALD BEASLEY, Individually and On	:	Civil Action No. 1:08-cv-00913-LTS
Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
TELETECH HOLDINGS, INC., et al.,	:	
	:	
Defendants.	:	
<hr/>	:	
WILLIAM BROWN, Individually and On	:	Civil Action No. 1:08-cv-01842-LTS
Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
TELETECH HOLDINGS, INC., et al.,	:	
	:	
Defendants.	:	
<hr/>	X	

NOTICE OF MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF  
AND FOR APPROVAL OF SELECTION OF LEAD COUNSEL

PLEASE TAKE NOTICE that Institutional Investor Electrical Workers Local #357 Pension and Health & Welfare Trusts (“Electrical Workers Local #357”) will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) consolidating the Actions; (ii) appointing Electrical Workers Local #357 as Lead Plaintiff; (iii) approving Electrical Workers Local #357’s selection of the law firm of Coughlin Stoia Geller Rudman & Robbins LLP to serve as Lead Counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, Electrical Workers Local #357 submits herewith a Memorandum of Law and Declaration of Mario Alba Jr., dated March 25, 2008.

DATED: March 25, 2008

COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP

*/s/ Mario Alba Jr.*

---

MARIO ALBA JR.

SAMUEL H. RUDMAN  
DAVID A. ROSENFELD  
MARIO ALBA JR.  
58 South Service Road, Suite 200  
Melville, NY 11747  
Telephone: 631/367-7100  
631/367-1173 (fax)

[Proposed] Lead Counsel for Plaintiffs

**CERTIFICATE OF SERVICE**

I, Mario Alba Jr., hereby certify that on March 25, 2008, I caused a true and correct copy of the attached:

Notice Of Motion For Consolidation, Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel;

Memorandum In Support Of The Motion Of Electrical Workers Local #357 Pension And Health & Welfare Trusts For Consolidation, Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel; and

Declaration Of Mario Alba Jr. In Support Of The Motion Of Electrical Workers Local #357 Pension And Health & Welfare Trusts For Consolidation, Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel

to be served: (i) electronically on all counsel registered for electronic service for this case; and (ii) by first-class mail to all additional counsel on the attached service list.

/s/ Mario Alba Jr.

Mario Alba Jr.

TELETECH HOLDINGS

Service List - 3/20/2008 (08-0051)

Page 1 of 2

**Counsel For Defendant(s)**

Jonathan E. Richman  
Debevoise & Plimpton LLP  
919 Third Avenue  
New York, NY 10022  
212/909-6000  
212/909-6836(Fax)

Geoffrey Hunter Coll  
Dewey & LeBoeuf LLP  
1101 New York Avenue, NW, Suite 1100  
Washington, DC 20005-4213  
202/986-8000  
202/986-8120(Fax)

Corinne Davina Levy  
Dewey & LeBoeuf LLP  
1301 Avenue of the Americas  
New York, NY 10019-6092  
212/259-8000  
212/259-6333(Fax)

Dennis P. Orr  
Jamie A. Levitt  
Morrison & Foerster LLP  
1290 Avenue of the Americas  
New York, NY 10104-0050  
212/468-8000  
212/468-7900(Fax)

Jay B. Kasner  
Gary J. Hacker  
Skadden, Arps, Slate, Meagher & Flom LLP  
Four Times Square  
New York, NY 10036  
212/735-3000  
212/735-2000(Fax)

**Counsel For Plaintiff(s)**

Evan J. Smith  
Brodsky & Smith, LLC  
240 Mineola Blvd., 1st Floor  
Mineola, NY 11501  
516/741-4977  
516/741-0626(Fax)

Samuel H. Rudman  
David A. Rosenfeld  
Coughlin Stoia Geller Rudman & Robbins LLP  
58 South Service Road, Suite 200  
Melville, NY 11747  
631/367-7100  
631/367-1173(Fax)

TELETECH HOLDINGS

Service List - 3/20/2008 (08-0051)

Page 2 of 2

Kim E. Miller

Kahn Gauthier Swick, LLC

12 East 41st Street, 12th Floor

New York, NY 10017

212/696-3730

504/455-1498(Fax)

Lewis S. Kahn

Kahn Gauthier Swick, LLC

650 Poydras Street, Suite 2150

New Orleans, LA 70130

504/455-1400

504/455-1498(Fax)

Richard A. Maniskas

D. Seamus Kaskela

David M. Promisloff

Schiffrin Barroway Topaz & Kessler, LLP

280 King of Prussia Road

Radnor, PA 19087

610/667-7706

610/667-7056(Fax)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

<hr/>		X
DONALD BEASLEY, Individually and On	:	Civil Action No. 1:08-cv-00913-LTS
Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
TELETECH HOLDINGS, INC., et al.,	:	
	:	
Defendants.	:	
<hr/>		
WILLIAM BROWN, Individually and On	:	Civil Action No. 1:08-cv-01842-LTS
Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
TELETECH HOLDINGS, INC., et al.,	:	
	:	
Defendants.	:	
<hr/>		X

[PROPOSED] ORDER CONSOLIDATING THE ACTIONS, APPOINTING LEAD  
PLAINTIFF AND APPROVING SELECTION OF LEAD COUNSEL

Having considered the Motion of Electrical Workers Local #357 Pension and Health & Welfare Trusts (“Electrical Workers Local #357”) for Consolidation, Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel and the Memorandum of Law and Declaration of Mario Alba Jr., in support thereof, and good cause appearing therefore:

1. The Actions are hereby consolidated;
2. Electrical Workers Local #357 is hereby appointed Lead Plaintiff for the Class pursuant to Section 27 of the Securities Act of 1933 and Section 21D of the Securities Exchange Act of 1934; and
3. The law firm of Coughlin Stoia Geller Rudman & Robbins LLP is hereby appointed Lead Counsel.

IT IS SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE LAURA T. SWAIN  
UNITED STATES DISTRICT JUDGE

I:\Teletch\LP Motion\LP Order.doc